UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA **Norfolk Division**

RECOVERY LIMITED PARTNERSHIP, Plaintiff,

Civil Action No.: 2:87-cv-00363 v.

UNIDENTIFIED, WRECKED AND ABANDONED SAILING VESSEL, etc., Defendant.

STATUS REPORT TO COURT

Recovery Limited Partnership (the "Plaintiff" or "RLP"), by counsel, respectfully submits this Report to the Court as salvor-in-possession of the wreck of the S.S. CENTRAL AMERICA. Plaintiff has previously submitted thirty-three reports: two in Civil Action No. 2:14cv-160, and thirty in Civil Action No. 2:87-cv-363. See ECF # 21 and 90 (No. 2:14-cv-160); ECF # 104, 130, 163, 175, 176, 177, 195, 202, 209, 233, 256, 264, 267, 273, 278, 280, 281, 289, 290, 291, 292, 293, 294, 295, 303, 304, 323, 330, 331, 334, and 335 (No. 2:87-cv-363).

As reported on January 31, 2025 (ECF # 331), the Trustee, John Pidcock, together with RLP's salvage adviser, Craig T. Mullen, are finalizing the 2025 salvage operation plans with CanPac Marine Services Inc. ("CanPac") as the lead salvor.

Since the last report, the Trustee has continued to coordinate closely with CanPac. Planning efforts have advanced, with discussions centered around equipment mobilization, vessel readiness, and overall salvage logistics.

The parties are currently finalizing a salvage plan, which is expected to align closely with the operations previously authorized by the Court. ECF #321. Once complete, the Trustee will submit a formal salvage plan on or before May 30, 2025 for the Court's consideration and subject to its approval. ECF # 336.

The Trustee is aware that exclusive jurisdiction over the salvage of the wreck of the S.S. CENTRAL AMERICA lies with this Court. He understands his obligation to notify this Court regarding any future salvage and will seek advance approval before any such salvage is performed in accordance with the Order entered January 11, 2019. ECF # 276.

The Trustee and counsel are available to address any questions that the Court may have regarding this Report.

This 30th day of April, 2025.

/s/ James L. Chapman, IV

James L. Chapman, IV, Esquire (VS. No. 21983) K. Barrett Luxhoj, Esquire (VS. No. 86302) Counsel for Recovery Limited Partnership CRENSHAW, WARE & MARTIN, PLC. 150 West Main Street, Suite 1923 Norfolk, Virginia 23510

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CERTIFICATE OF SERVICE

Document 337

I hereby certify that on the 30th day of April, 2025, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV

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